

EXHIBIT B

Protected Material - Pursuant to Protective Order

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF OHIO
3 - - -
4 SARA HAWES, Individually :
 and on behalf of all :
5 others similarly :
 situated, :
6 :
 Plaintiffs, :
7 : Case No. 17-cv-00754 No.
 vs. :
8 :
 MACY'S WEST STORES, INC., :
9 :
 Defendants. :

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- - -

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PROTECTED MATERIAL - PURSUANT TO PROTECTIVE ORDER

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 REMOTE DEPOSITION OF RULE 30(b) (6)
13 of AQ TEXTILES, INC., and
 LAWRENCE E. QUEEN
14 VIDEOCONFERENCE

15

- - -

16

Tuesday, November 17, 2020

9:35 a.m. EST

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Greensboro, North Carolina

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ANN FORD

REGISTERED PROFESSIONAL REPORTER

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1 2012, so it probably should get generally updated
2 anyway.

3 So that committee could make a
4 recommendation. And for that recommendation to pass,
5 you have to have 100 percent of the vote. If there's
6 one dissention, it doesn't pass.

7 So there were some attempts, I think, for
8 some language in 2019 that I don't remember the
9 number, but something like 40 people or so passed it,
10 and two people shot down the language. So it's
11 still -- the committee is extremely slow because
12 there's so many different entities involved. And
13 it's still an open issue.

14 Q. Is it the case that the ASTM method of
15 counting only looks at the number of yarns that are
16 at the end or at the pick; whereas the method of
17 counting you had advocated would have allowed the
18 counting of individual fibers that appear at the end
19 of a yarn?

20 A. No. No. Wrong.

21 Q. How would yours have differed?

22 A. My presentation suggested that the --
23 they're yarns. They're not fibers; they're
24 individual yarns. And there's a diagram in that

1 presentation showing how -- in a very simple format,
2 how the sheets are woven.

3 Q. What's your definition of "yarn"?

4 A. Yarn is yarn. I mean, I don't know how --
5 I don't have a specific definition. It's something
6 that you use to make fabric.

7 Q. What's your definition of "fiber"?

8 A. Fiber is something you can use to make
9 yarn or use for other purposes.

10 Q. What's the difference between a yarn and a
11 fiber?

12 A. I just said fiber is something you would
13 use to make yarn, is my understanding. Yarn is the
14 result of using fiber to make it.

15 Q. After the ASTM declined to change the
16 thread count standard, did AQ do anything?

17 A. They never defined -- they never defined a
18 standard.

19 Q. Well, we agreed that ASTM 3775 applied to
20 the CVC sheets.

21 A. Sorry. You broke up.

22 Q. I thought we previously agreed that ASTM
23 Standard 3775 applies to how to count the threads in
24 CVC sheets but that you thought the standard should

1 Q. How are they different?

2 A. I think, to your example before, a
3 filament is a small piece of polyester, and you put
4 several of those together to make a yarn. Like your
5 cotton staple that you suggested, you put several of
6 those together to make a cotton yarn. That's my
7 understanding.

8 Q. And in determining thread count, what do
9 you count in that instance?

10 A. The yarn.

11 Q. Okay. It would be inappropriate to count
12 the individual filaments or fibers?

13 A. I believe so.

14 Q. Okay. All right. Topic 6, which is
15 "whether, when, and how . . . as well as how AQ
16 counted the threads."

17 (Technical interruption.)

18 THE COURT REPORTER: Did you read
19 the whole thing because I think you cut
20 out.

21 MR. LEGANDO: I did read the whole
22 thing.

23 THE COURT REPORTER: I just wanted
24 you to know, you're going in and out.